

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-G and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: December 12, 2016

EXHIBIT A – AYLSTOCK, WITKIN, KREIS & OVERHOLTZ

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-11063	Andra Marie Miller v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – COHEN & MALAD

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-28670	Lisa Santaliz v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – CORY WATSON, P.C.

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-00763	Laquita Riddick, Carl Riddick v. Johnson & Johnson, Ethicon, Inc., American Medical Systems, Inc.

EXHIBIT D – HEARD ROBINS CLOUD

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-02852	Marie Morris v. Johnson & Johnson, Ethicon, Inc., American Medical Systems, Inc.
2:14-CV-10416	Marilyn Cavanaugh v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Mentor Worldwide LLC
2:14-CV-22426	Betty Wyatt, Raymond Wyatt v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT E – THE MILLER FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-17481	Sandra Burlingame v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – THE MOODY LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-08534	Cynthia Brown, Charles Brown v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT G – WILLIAMS KHERKHER HART BOUNDAS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-23092	Rita Steinberger v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis
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